

Practicing in New York & New Jersey

Westchester Office 75 S. Broadway Suite 400 White Plains, N.Y. 10601 William@Wagstaff.Legal

(914) 226-3300

Manhattan Office 34 E. 23rd Street New York, N.Y.10010 By Appointment Only

Of Counsel: Tracey A. Grant Kimberly A. Carpenter

February 9, 2022

VIA ECF & EMAIL

Hon. Karen M. Williams United States District Judge Mitchell H. Cohen Building & U.S. Courthouse 4th & Cooper Streets Camden, NJ 08101

Re: Gordon et al v. Wetzel et al – 1:21-cv-04861

Dear Judge Williams:

I write to request an extension of plaintiffs' time to file opposition papers to defendants Gurbir Singh Grewal and Patrick J. Callahan's ("State Defendants") motion to dismiss the Third Amended Complaint. Deputy Attorney General Marvin Freeman and Kerri E. Chewning, counsel for Sgt. Wetzel both consent¹.

The motion is currently set for February 22, 2022, and plaintiffs seek an adjournment to the Motion Day on March 21, 2022.

Respectfully,

/s/William O. Wagstaff III

¹ Plaintiffs requested a Clerk's extension prior to the due date of the opposition papers which was granted and then reversed today and directed Plaintiffs' to request the extension from Your Honor.

Cc: Neal Wiesner Eric Intriago Marvin Freeman Kerri Chewning Amy Pearl